DRAFT DETERMINATION – PARTICIPANT RESPONSE PACK

METER CHURN PACKAGE

***Participant**: ERM Power Limited*

***Completion Date**: 4 December 2014*

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1. Proposed Changes

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- SLP Metering Provider Services Category B for Metering Installation Types 1, 2, 3, 4, 5 and 6

NOTE: Below are two specific things requiring comment:

Effective date of implementation

Significant change to 8.1.6 (c) of the MDP SLP.

Other minor changes please refer to the combined response packs for more information.

Please include your comments in the 'Participant Comment' column below.

A. Proposed Changes to the Meter Churn Package

Item	Description	Category	Participant Comments
1	**PROPOSED/ REQUESTED CHANGES**		
1.1	During the feedback process for first stage consultation AEMO received comments regarding the implementation date of December 2014. Feedback received requested a September or November 2015 implementation date. Implementation dates were discussed at the MSWG on the 31st October 2014 with the most favourable date being November 2015 by the members of the MSWG. AEMO has provided 2 options: Implementation date of 30th September 2015 as per majority of the feedback from participants; Or Implementation date of November 2015 to align with a MSATS/B2B system release.	**Procedure only**	If this change should proceed, ERM Business Energy prefers an implementation date of November 2015 to align with a MSATS/B2B system release. Grandfathering would be required for contracts that have already been executed that comply with the current Procedures (i.e. require meter replacement prior to contract start date). It is important that the implementation of the proposed Procedures allows retailers to honour these existing contracts, which were entered into in good faith based on the Procedures in place at that time. Renegotiation of these contracts is not a viable option. Not only would this require significant resources, but would also impose on the customer significant additional cost due to the requirement for an additional metering services contract for the transitional period between their contract start date and meter

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			replacement under the proposed Procedures. Transfers of some of these customers have already been generated in the market; however there are also some contracts that do not commence for a number of years (i.e. beyond the proposed effective date). We believe that where contractual arrangements were entered into prior to the final determination of the new Procedures, these contracts should be allowed to proceed in compliance with the current Procedures.
1.2	MDP SLP Section 8 8.1.6 (c) change to the clause (c) Where the *Metering Data Provider* is changing as a result of the *Meter Churn* and there is a delay in the change of the *Metering Data Provider* role in MSATS: i. the *Metering Data Provider* must make the data stream inactive in MSATS for the removed meter with an effective start date of the *Meter Churn* day. ~~i. the old Metering Data Provider must provide substituted metering data in accordance with the metrology procedure: Part B with a quality flag of 'S' and a reason code of 37 (meter under churn) in the MDFF until the new Metering Data Provider becomes the Metering Data Provider in MSATS; and~~ ~~ii. the new Metering Data Provider, when it becomes the Metering Data Provider in MSATS, must provide actual metering data for the period of substitution in (c)(i) above.~~	**Procedure only**	We do not believe it is appropriate for the data stream for the existing meter to be made inactive from the meter churn day, and for the old MDP to have no obligations to provide substituted data in instances where there is a delay in updating MSATS. Until MSATS is updated, the old MDP remains responsible for the provision of metering data at the site, and therefore must ensure that at least substitute data is available. There are a number of situations that could lead to a delay in MSATS being updated with the new MDP. These include where the meter was replaced out of business hours, where there is a comms failure, or simply due to the standard timeframes for certain participants to complete their business processes. Further, the meter churn day cannot always be correctly identified by the old MDP when a meter is replaced out of business hours, there is a comms failure, or processes otherwise break down. The transaction to effect the role change would be a CR6800 – independent of change of retailer. While this transaction requires a proposed date to be elected, this date simply represents the earliest date that MSATS could be updated with the new MDP, and therefore does not provide any certainty to the

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			old MDP of the day that the new MDP will take on responsibility for the site. In instances where the meter churn day does not align with the date that MSATS is updated, there will be a period of time where the old MDP will be responsible for the site, but under the proposed change, would have made the data stream inactive. The only participant able to provide data for this period is the old MDP, who has the site history to provide substituted data. We do not believe the deleted clauses (i) and (ii) place onerous obligations on MDPs, and considering the value of substituted data in instances where the process breaks down, they should be retained.